

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHIRLEY MACK on behalf of herself and	)	
others similarly situated,	)	1:11-cv-9008
Plaintiffs,	)	
	)	Judge Kim (by consent)
v.	)	
	)	
GENERAL MOTORS FINANCIAL	)	JURY DEMANDED
COMPANY, INC. f/k/A AMERICREDIT	)	
CORP.,	)	
Defendant.	)	

**Report of Conference of Parties**

**I. Electronically Stored Information “ESI”**

**(a) Whether they anticipate discovery of ESI in the case.**

The parties do anticipate discovery of ESI in this case. Plaintiff anticipates that defendant’s call records and perhaps alleged records of consent may be electronically stored. Plaintiff served a document preservation demand along with the complaint.

**(b) What agreements they have reached regarding discovery of ESI.**

The parties have generally discussed ESI, but have not made any formal agreements regarding such.

**(c) What areas of disagreement they have with regard to discovery of ESI.**

**II. Pre-Discovery Disclosures:** The parties suggest that Rule 26(a)(1) disclosures be made by March 7, 20102.

**III. Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

**(a) Discovery will be needed on the following subjects:**

Plaintiff will need discovery regarding defendant’s predictive dialing practices and procedures, such as the handling of demands to stop calling, the class members’

identities and number of calls, the nature of defendant's dialing equipment (if defendant contends its equipment is not regulated by the TCPA) and any defenses, including prior express consent.

Defendant will need discovery from plaintiff regarding her claims, and her ability to be an adequate class representative.

(b) All non-expert fact discovery to be completed by October 31, 2012.

(c) The parties do not currently anticipate any variations in the default discovery limits.

(d) Reports from retained experts under Rule 26(a)(2) due from the party with the burden of proof as to the matters in the report by August 30, 2012; response by September 30. All retained expert depositions to be completed by October 31, 2012.

Respectfully submitted,

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